



STANDARDS OF APPRENTICESHIP

adopted by

WASHINGTON STATE DEPARTMENT OF LABOR AND INDUSTRIES/CLASSIFIED EMPLOYEES JOINT APPRENTICESHIP AND TRAINING COMMITTEE

| <u>Skilled Occupational Objective(s):</u> | <u>(sponsor)</u> | <u>DOT</u> | <u>Term</u> |
|-------------------------------------------|------------------|-------------|-------------|
| AUDITOR | | 160.167-038 | 4000 HOURS |
| INDUSTRIAL RELATIONS AGENT | | 166.267-042 | 4500 HOURS |
| WORKERS' COMPENSATION ADJUDICATOR 2 | | 169.267-010 | 22 MONTHS |



APPROVED BY

Washington State Apprenticeship and Training Council

REGISTERED WITH

Apprenticeship Section of Specialty Compliance Services Division

Washington State Department Labor and Industries

Post Office Box 44530

Olympia, Washington 98504-4530

APPROVAL:

APRIL 19, 2002

Initial Approval

JULY 18, 2003

Committee Amended

JULY 18, 2003

Standards Amended (review)

APRIL 16, 2004

Standards Amended (administrative)

By: LAWRENCE CROW
Chair of Council

By: PATRICK WOODS
Secretary of Council

**WASHINGTON STATE DEPARTMENT OF LABOR AND INDUSTRIES/CLASSIFIED
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The Washington State Apprenticeship and Training Council (WSATC) has the authority to develop, administer, and enforce apprenticeship program standards (Standards) for the operation and success of an apprenticeship and training program in the State of Washington.

Apprenticeship programs and committees function, administer, or relinquish authority only with the consent of the WSATC and only apprentices registered with the supervisor or recognized under the terms and conditions of a reciprocal agreement will be recognized by the WSATC. Parties signatory to these Standards declare their purpose and policy is to establish and sponsor an organized system of registered apprenticeship training and education.

These Standards are in conformity and are to be used in conjunction with the Apprenticeship Rules, Chapter 296-05 WAC (Washington Administrative Code); Apprenticeship Act, Chapter 49.04 RCW (Revised Code of Washington); The National Apprenticeship Act, 29 U.S.C. (United States Code) 50; Apprenticeship Programs, Title 29 Part 29 CFR (Code of Federal Regulations); and Equal Employment Opportunity in Apprenticeship and Training, Title 29 Part 30 CFR which govern employment and training in apprenticeable occupations. They are part of this apprenticeship agreement and bind all signers to compliance with all provisions of registered apprenticeship. Additional information may need to be maintained by the program that is supplemental to these apprenticeship standards. This information is for purposes of ensuring compliance with decisions of the WSATC and the apprenticeship laws identified above.

If approved by the council, such amendment/s and such changes as adopted by the council shall be binding to all parties. Sponsors shall notify apprentices of changes as they are adopted by the council. If and when any part of these Standards becomes illegal, as pertains to federal and/or state law, that part and that part alone will become inoperative and null and void, and the Department of Labor and Industries (L&I) may adopt language that will conform to applicable law. The remainder of the Standards will remain in full force and effect.

See WAC 296-05-003 for the definitions necessary for use with these Standards.

These standards represent more than a legal bond between the Department of Labor and Industries and the Washington Federation of State Employees. They reflect a renewed commitment to create and sustain a spirit of cooperation in workforce education and training.

The program offers a standardized, consistent, effective training opportunity that includes college level coursework, on-the-job training, and additional training mechanisms. By way of this program, the training can be tailored to specifically address the needs of a particular occupation.

When approved by and registered with Washington State Apprenticeship and Training Council, they will assure the development of highly qualified classified employees for a variety of occupations within the Department throughout the state.

When fully implemented, use of these apprenticeship standards will demonstrate labor and management's commitment to utilize the most effective workforce education and training tool.

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I. GEOGRAPHIC AREA COVERED:

The sponsor has no authority to conduct training outside of the geographical area covered by these Standards. The sponsor may enter into an agreement (portability agreements – see WAC 296-05-303(3)) with other apprenticeship committees for the use of apprentices by training agents that are working outside their approved geographic area. Also, if a reciprocity agreement (see WAC 296-05-327) is in place, the out-of-state sponsor may use their registered apprentices. The sponsor will ensure compliance with the provisions of any agreement recognized by the WSATC.

The geographical area covered by these standards shall be the State of Washington.

II. MINIMUM QUALIFICATIONS:

Minimum qualifications must be clearly stated and applied in a nondiscriminatory manner (see WAC 296-05-316).

A. Auditor and Industrial Relations Agent:

Age: **Must be at least 18 years of age.**

Education: **High School diploma or GED.**

Physical: **Be able to perform all tasks of the occupation.**

Testing: **None.**

Other: **Current employee of the State of Washington**

B. Workers Compensation Adjudicator 2:

Age: **Must be at least 18 years of age.**

Education: **One year of experience in adjudication in a workers' compensation or crime victims' compensation insurance program.**

Experience working with insurance claims within Labor and Industries or in claims/insurance adjusting, claims investigations, paramedical occupations, claims risk management/loss control, medical billing, medical paralegal or paralegal services with experience in personal injury or

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medical insurance or related fields will substitute, year for year, for required education OR

A Bachelor's degree

A combination of education and/or experience may substitute for required education.

Physical: **Be able to perform all tasks of the position.**

Testing: **None**

Other: **Does not have to be a current employee of the State of Washington.**

**III. CONDUCT OF PROGRAM UNDER WASHINGTON EQUAL EMPLOYMENT
OPPORTUNITY PLAN:**

Sponsors with five (5) or more apprentices must adopt an Equal Employment Opportunity (EEO) Plan and Selection Procedures (see Part D of Chapter 296-05 WAC and 29 CFR Part 30).

The recruitment, selection, employment and training of apprentices during their apprenticeship shall be without discrimination because of race, sex, color, religion, national origin, age, disability or as otherwise specified by law. The sponsor shall take positive action to provide equal opportunity in apprenticeship and will operate the apprenticeship program as required by the rules of the Washington State Apprenticeship and Training Council and Title 29, Part 30 of the Code of Federal Regulations. (WAC 296-05-316(3))

A. Selection Procedures:

**Exempt by reason of selection through Civil Service Rules
(WAC 296-05-405)(1)(b)(iv)**

B. Equal Employment Opportunity Plan:

**Exempt by reason of selection through Civil Service Rules
(WAC 296-05-405)(1)(b)(iv)**

Discrimination Complaints.

Any apprentice or applicant for apprenticeship who believes they have been discriminated against may file a complaint (WAC 296-05, Part D).

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IV. TERM of APPRENTICESHIP:

The minimum term of apprenticeship must not be less than 2000 hours or 12 months of work experience in each occupation identified in these Standards as apprenticeable. The term of apprenticeship must be stated in hours or months of employment.

- A. The term of apprenticeship for Auditor shall be 4000 hours of employment as an apprentice.**
- B. The term of apprenticeship for Industrial Relations Agent shall be 4500 hours of employment as an apprentice.**
- C. The term of apprenticeship for the Workers' Compensation Adjudicator 2 shall be 22 months of employment as an apprentice.**

V. INITIAL PROBATIONARY PERIOD:

All apprentices are subject to an initial probationary period, stated in hours or months of employment for which they receive full credit toward completion of apprenticeship. Advance credit/standing will not reduce the initial probationary period. The initial probationary period:

- Is the period following the apprentice's acceptance into the program and during which the apprentice's appeal rights are impaired. The initial probation must not exceed twenty percent (20%) of the term of apprenticeship unless an exemption by the WSATC has been granted for longer probationary periods as specified by Civil Service or law.
- Is the period that the WSATC or the supervisor of apprenticeship may terminate an apprenticeship agreement at the written request by any affected party. The sponsor or the apprentice of the apprenticeship agreement may terminate the agreement without a hearing or stated cause. An appeal process is available to apprentices who have completed the initial probationary period.

As established under Washington State Civil Service Rules (WAC 356-30-260) .

VI. RATIO OF APPRENTICES TO JOURNEY LEVEL WORKERS:

Supervision is the necessary education, assistance, and control provided by a journey-level employee that is on the same job site at least seventy-five percent of each working day, unless otherwise approved by the WSATC. The sponsor will assure that apprentices

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are under the supervision of competent and qualified journey-level workers on the job who are responsible for the work being performed, to ensure safety and training in all phases of the work. Apprentices will work the same hours as journey-level workers, EXCEPT where such hours may interfere with related/supplemental instruction. (see WAC 296-05-316(5))

When the employer employs one (1) full time journey level person for the trade they shall be entitled to employ one (1) apprentice for the trade. Thereafter, the employer may employ apprentices at a ratio of one (1) apprentice for each journey level person employed for that trade. The ratio is specific as to application in terms of the employer's work force.

VII. APPRENTICE WAGES and WAGE PROGRESSION:

The apprentice will be paid a progressively increasing schedule of wages based on specified percentages of journey-level wage consistent with skills acquired. These may be indicated in hours or monthly periods set by the sponsor. The entry wage will not be less than the minimum wage prescribed by the Fair Labor Standards Act, where applicable, unless a higher wage is required by other applicable federal law, state law, respective regulations, or by collective bargaining agreement.

The sponsor may accelerate, by an evaluation process, the advancement of apprentices who demonstrate abilities and mastery of the occupation to the level for which they are qualified. When the apprentice is granted advanced standing the sponsor must notify the employer/training agent of the appropriate wage per the wage progression schedule specified in these Standards.

A. Auditor

| Period | Months/Hours | Percentage of the Journeylevel Wage |
|--------|-----------------------------------|-------------------------------------|
| 1 | 0 - 6 months */0000 - 1000 hours | 80% |
| 2 | 7 - 12 months*/1001 - 2000 hours | 85% |
| 3 | 13 - 18 months*/2001 - 3000 hours | 90% |
| 4 | 19 - 24 months*/3001 - 4000 hours | 95% |

B. Industrial Relations Agent

| Period | Months/Hours | Percentage of the Journeylevel Wage |
|--------|-----------------------------------|-------------------------------------|
| 1 | 0 - 6 months */0000 - 1000 hours | 75% |
| 2 | 7 - 12 months*/1001 - 2000 hours | 80% |
| 3 | 13 - 18 months*/2001 - 3000 hours | 85% |
| 4 | 19 - 24 months*/3001 - 4000 hours | 90% |
| 5 | 25 - 27 months*/4001 - 4500 hours | 95% |

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***Note: This is at full-time status. 6 months normally equals 1000 hours of full-time employment.**

C. Workers' Compensation Adjudicator 2

| Period | Months/Hours | Percentage of the Journeylevel Wage |
|----------|----------------------|-------------------------------------|
| 1 | 0 - 6 months | 87% |
| 2 | 7 - 10 months | 90% |
| 3 | 11 - 22 month | 93% |

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VIII. WORK PROCESSES:

The apprentice shall receive on the job instruction and experience as is necessary to become a qualified journey-level worker versed in the theory and practice of the occupation covered by these Standards. The following is a condensed schedule of work experience, which every apprentice shall follow as closely as conditions will permit.

Employers/training agents shall only use registered apprentices to perform the work processes as stated in this section. (WAC 296-05-003 - Definitions)

| A. <u>Auditor</u> | <u>Approximate Hours</u> |
|--------------------------------------------------------------------------------------|---------------------------------|
| 1. Industrial Insurance Laws, Rules and Regulations (Policies & Procedures) | 1750 |
| 2. Tax and Financial Auditing Techniques..... | 1750 |
| 3. Automated Auditing Systems..... | 200 |
| 4. Classification Survey | <u>300</u> |
| TOTAL HOURS: | 4000 |

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| B. <u>Industrial Relations Agent</u> | <u>Approximate Hours</u> |
|------------------------------------------------|---------------------------------|
| 1. Investigation/Auditing Records | 1500 |
| 2. Employment Standards | 1500 |
| Laws | |
| Regulations, including agriculture | |
| Citation/civil infractions | |
| 3. Prevailing Wage | 1000 |
| Laws | |
| Regulations | |
| Notice of violations | |
| Liens | |
| 4. Negotiation/Mediation | 400 |
| 5. Outreach | 80 |
| 6. Computer Operations..... | 20 |
| LIINIS | |
| PESCH | |
| DOL Master Business License | |
| Teen Injury | |
| Total Hours: | 4500 |

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| C. <u>Workers' Compensation Adjudicator 2</u> | <u>Approximate Months</u> |
|------------------------------------------------------------|----------------------------------|
| 1. Introduction to L & I and Claims Administration | 03.25 Months |
| 2. Claim Validity | 03.67 Months |
| 3. Wage Rate and Entitlement to Wage Loss Benefits | 03.93 Months |
| 4. Medical Management | 03.95 Months |
| 5. Vocational Rehabilitation..... | 03.42 Months |
| 6. Claim Resolution | 03.78 Months |
| TOTAL | 22.00 MONTHS |

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IX. RELATED/SUPPLEMENTAL INSTRUCTION:

The apprentice must attend related/supplemental instruction. Time spent in related/supplemental instruction will not be considered as hours of work, and the apprentice is not to be paid for time so spent, unless otherwise stated in these Standards.

The sponsor/training agent must provide for instruction of the apprentice during the related/supplemental instruction in safe and healthful work practices in compliance with the Washington Industrial Safety and Health Act, and applicable federal and state regulations.

In case of failure on the part of any apprentice to fulfill this obligation, the sponsor has authority to take disciplinary action (see Administrative/Disciplinary Procedures section).

Clock hours of actual attendance by the apprentice in related/supplemental instruction classes at the community/technical college or other approved training locations shall be reported to L&I on a quarterly basis for verifying attendance and industrial insurance purposes.

For industrial insurance purposes, the WSATC will be considered as the employer should any apprentice, not being paid to attend, sustain an injury while participating in related/supplemental classroom activity, or other directly related activity outside the classroom. The activities must be at the direction of the instructor.

The methods of related/supplemental training must consist of one or more of the following:

- (X) Supervised field trips
- (X) Approved training seminars
- () A combination of home study and approved correspondence courses
- (X) State Community/Technical college
- () Private Technical/Vocational college
- () Training trust
- (X) Other (specify) **Classes provided by the State of Washington Department of Personnel and the Department of Labor and Industries.**

144 Minimum RSI hours per year, (see WAC 296-05-305(5))

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Additional Information:

Satisfactory progress is defined as apprentices must regularly attend and complete all related/supplemental instruction classes as directed by the JATC.

X. ADMINISTRATIVE/DISCIPLINARY PROCEDURES:

Sponsors may include in this section requirements and expectations of the apprentices and training agents and an explanation of disciplinary actions that may be imposed for noncompliance. The sponsor has the following disciplinary procedures that they may impose: Disciplinary Probation, Suspension, or Cancellation.

Disciplinary Probation: A time assessed when the apprentice's progress is not satisfactory. During this time the program sponsor may withhold periodic wage advancements, suspend or cancel the apprenticeship agreement, or take further disciplinary action. A disciplinary probation may only be assessed after the initial probation is completed. During the disciplinary probation, the apprentice has the right to file an appeal of the committee's action with the WSATC (as described in WAC 296-05-009).

Suspension: A suspension is a temporary interruption in progress of an individual's apprenticeship program that may result in the cancellation of the Apprenticeship Agreement. Could include temporarily not being allowed to work, go to school or take part in any activity related to the Apprenticeship Program until such time as the Apprenticeship Committee takes further action.

Cancellation: Refers to the termination of an apprenticeship agreement at the request of the apprentice, supervisor, or sponsor. (as described in WAC 296-05-009).

A. General Procedures

All apprentice complaints that involve matters covered by a collective bargaining agreement are not subject to the Washington State Apprenticeship and Training Council established complaint procedures

B. Local Apprenticeship Committee Policies

NONE

C. Complaint and Appeal Procedures:

All approved programs must establish procedures explaining the program's complaint review process. Complaints that involve matters covered by a collective bargaining agreement are not subject to the complaint review procedures in this section.

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Complaint (after initial probation completed) – WAC 296-05-009 and 296-05-316(21)

Prior to: 20 days of intention of disciplinary action by a committee/organization

- Committee/organization must notify the apprentice in writing of action to be taken
- Must specify the reason(s) for discipline, suspension, or cancellation
- Decision will become effective immediately
- Written reason(s) for such action will be sent to the apprentice

Within: 30 days request for reconsideration from the committee

- Apprentice to request local committee to reconsider their action

Within: 30 days of apprentice's request for reconsideration

- Local committee/organization must provide written notification of their final decision

If apprentice chooses to pursue the complaint further:

Within: 30 days of final action

- Apprentice must submit the complaint in writing to the supervisor (L&I)
- Must describe the controversy and provide any backup information
- Apprentice must also provide this information to the local committee/organization

Within: 30 days for supervisor to complete investigation

- If no settlement is agreed upon during investigation, then supervisor must issue a written decision resolving the controversy when the investigation is concluded

If the apprentice or local committee/organization disputes supervisor decision:

Within: 30 days of supervisor's decision, request for WSATC hearing

- Request must be in writing
- Must specify reasons supporting the request
- Request and supporting documents must be given to all parties
- WSATC must conduct the hearing in conjunction with the regular quarterly meeting

Within: 30 days after hearing

- WSATC to issue written decision

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XI. COMMITTEE – RESPONSIBILITIES AND COMPOSITION

NOTE: The following is an overview of the requirements associated with administering an apprenticeship committee and/or program. These provisions are to be used with the corresponding RCW and/or WAC.

The sponsor is the policymaking and administrative body responsible for the operation and success of this apprenticeship program. A committee is responsible for the day-to-day operations of the apprenticeship program and they must be knowledgeable in the process of apprenticeship and/or the application of Chapter 49.04 RCW and Chapter 296-05 WAC. Sponsors must develop procedures for:

- A. Committee Operations (WAC 296-05-316): (Not applicable for Plant Programs)
Convene meetings at least three times per year of the program sponsor and apprenticeship committee attended by a quorum of committee members as defined in the approved Standards. If the committee does not indicate its definition of quorum, the interpretation will be “50% plus 1” of the approved committee members. Conference call meetings may be conducted in lieu of regular meetings but must not exceed the number of attended meetings and no disciplinary action can be taken during conference call meetings.
- B. Program Operations (Chapter 296-05 WAC - Part C & D):
1. The sponsor will record and maintain records pertaining to the local administration of the apprenticeship program and make them available to the WSATC or its representative on request.

Records required by WAC 296-05-400 through 455 (see Part D of Chapter 296-05 WAC) will be maintained for five (5) years; all other records will be maintained for three (3) years.
 2. The sponsor will submit to L&I through the assigned state apprenticeship coordinator the following list:

Forms are available on line at <http://www.LNI.wa.gov/scs/apprenticeship> or from your assigned apprenticeship coordinator.

- Apprenticeship Agreement Card – within first 30 days of employment
- Authorization of Signature - as necessary
- Authorized Training Agent Agreements (committee approving or canceling) – within 30 days
- Apprenticeship Committee Meeting Minutes – within 30 days of meeting (not required for Plant program)

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- Change of Status – within 30 days of action by committee, with copy of minutes
 - Journey Level Wage – at least annually, or whenever changed
 - Revision of Standards and/or Committee Composition - as necessary
 - RSI (Quarterly) Reports:
 - 1st quarter: January through March, by April 10
 - 2nd quarter: April through June, by July 10
 - 3rd quarter: July through September, by October 10
 - 4th quarter: October through December, by January 10
3. Adopt, as necessary, local program rules or policies to administer the apprenticeship program in compliance with these Standards that must be submitted for L&I approval and updating these Standards. The L&I apprenticeship program manager may administratively approve requests for revisions in the following areas of the Standards:
- Program name
 - Section III: Conduct of Program Under Washington Equal Employment Opportunity Plan
 - Section VII: Apprentice Wages and Wage Progression
 - Section IX: Related/Supplemental Instruction
 - Section XI: Committee - Responsibilities and Composition (including opening statements)
 - Section XII: Subcommittees
 - Section XIII: Training Director/Coordinator

C. Management of Apprentices:

1. Each apprentice (and, if under 18 years of age, the parent or guardian) will sign an apprenticeship agreement with the sponsor, who will then register the agreement, with L&I before the apprentice attends the related/supplemental instruction classes, or within the first 30 days of employment as an apprentice. For the purposes of industrial insurance coverage and prevailing wage exemption under RCW 39.12.021, the effective date of registration will be the date the agreement is received by L&I.

L&I must be notified within 30 days of program approval, of all requests for disposition or modification of agreements, with a copy of the committee minutes approving the changes, which may be:

- Certificate of completion
- Additional credit
- Suspension (i.e. military service or other)
- Reinstatement
- Cancellation and/or
- Corrections

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2. Rotate apprentices in the various processes of the skilled occupation to ensure the apprentice is trained to be a competent journey-level worker.
3. Periodically review and evaluate apprentices before advancement to the apprentice's next wage progression period. The evidence of such advancement will be the record of the apprentice's progress on the job and during related/supplemental instruction.
4. The sponsor has the obligation and responsibility to provide, insofar as possible, continuous employment for all apprentices in the program. The sponsor may arrange to transfer an apprentice from one training agent to another, or to another sponsor when the sponsor is unable to provide reasonably continuous employment, or they are unable to provide apprentices the diversity of experience necessary for training and experience in the various work processes as stated in these Standards. The new sponsor or training agent will assume all the terms and conditions of these Standards. If, for any reason, a layoff of an apprentice occurs, the apprenticeship agreement will remain in effect unless canceled by the sponsor.
5. An apprentice who is unable to perform the on-the-job portion of apprenticeship training may, if the apprentice so requests and the sponsor approves, participate in related/supplemental instruction, subject to the apprentice obtaining and providing to the sponsor written requested document/s for such participation. However, time spent will not be applied toward the on-the-job portion of apprenticeship training.
6. Hear and adjust all complaints of violations of apprenticeship agreements.
7. Upon successful completion of apprenticeship, as provided in these Standards, and passing the examination that the sponsor may require, the sponsor will recommend that the WSATC award a Certificate of Completion of Apprenticeship. The program will make an official presentation to the apprentice that has successfully completed his/her term of apprenticeship.

D. Training Agent Management:

1. Offer training opportunities on an equal basis to all employers and apprentices. Grant equal treatment and opportunity for all apprentices through reasonable working and training conditions and apply those conditions to all apprentices uniformly. Provide training at a cost equivalent to that incurred by currently participating employers and apprentices. Not require an employer to sign a collective bargaining agreement as a condition of participation.
2. Determine the adequacy of an employer to furnish proper on-the-job training in accordance with the provisions of these Standards. Require all employers requesting approved training agent status to complete an approved training agent

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agreement and comply with all federal and state apprenticeship laws and the appropriate apprenticeship Standards.

3. Submit approved training agent agreements to the department with a copy of the agreement and/or the list of approved training agents within thirty days of committee approval. Submit rescinded approved training agent agreements and/or the list of approved training agents to the department within thirty days of said action.

E. Composition of Committee: (see WAC 296-05-313)

Apprenticeship committees must be composed of an equal number of management and non-management representatives composed of at least four members but no more than twelve. If the committee does not indicate its definition of a quorum, the interpretation will be "50% plus 1" of the approved committee members.

Apprenticeship committees shall elect a chairperson and a secretary who shall be from opposite interest groups, i.e., chairperson-employers; secretary-employees, or vice versa; EXCEPT, this does not apply where the Registration Agency represents the apprentice(s).

For plant programs the WSATC or the department designee will act as the employee representative.

Quorum: A quorum shall consist of two (2) members from the employer and two (2) members from the employees.

Program type administered by the committee: **INDIVIDUAL JOINT**

The employer representatives shall be:

Ernie LaPalm, Secretary
7273 Linderson Way SW
Tumwater, WA 98504

Chris Bowe
PO Box 69050
Tukwila, WA 98168-3346

Sandi LaPalm
7273 Linderson Way SW
Tumwater, WA 98504

Sara Spiering
7273 Linderson Way SW
Tumwater, WA 98504

Cheri Ward
7273 Linderson Way SW
Tumwater, WA 98504

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The employee representatives shall be:

**Bruce Zeller, Chairman
805 Plum St SE
Olympia, WA 98504-4613**

**William Chrisman
525 College Way, Suite H
Mount Vernon, WA 98273**

**Veronica Gottschalk
3001 West Broadway
Moses Lake, WA 98837**

**Jess King
7273 Linderson Way SW
Tumwater, WA 98504**

**Debbie Brookman
7273 Linderson Way SW
Tumwater, WA 98504**

XII. SUBCOMMITTEE:

Subcommittee(s) approved by L&I, represented equally from management and non-management, may also be established under these Standards, and are subject to the main committee. All actions of the subcommittee(s) must be approved by the main committee.

NONE

XIII. TRAINING DIRECTOR/COORDINATOR:

The sponsor may employ a person(s) as a full or part-time training coordinator(s)/training director(s). This person(s) will assume responsibilities and authority for the operation of the program as are delegated by the sponsor.

NONE